

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

JON NORTHRUP
PATRICIA NORTHRUP

Chapter 13
5:16-bk-00257-RNO

DEBTORS' MOTION TO CONTINUE

AND NOW, come the Debtors, Jon Northrup and Patricia Northrup, by and through their attorney, Richard R. Jennings, and aver as follows:

1. A Confirmation Hearing/Hearing Upon Objection To Confirmation Of Plan is scheduled for July 27, 2016 at 9:30 a.m. at 197 South Main Street, Courtroom 2, Max Rosenn U.S. Courthouse, Wilkes-Barre, PA 18701.
2. Debtors request a continuance of said hearing until after the Proof of Claim of U.S. Bank National Association is filed which would afford Debtors and the undersigned an opportunity to review the Proof of Claim.
3. The final payment on the Buick Park Avenue, listed in Schedule A/B, has been made, and thereby, the resulting increase in disposable income can be applied toward the U.S. Bank Association Proof of Claim.
4. The Chapter 13 Trustee has no objection to the continuance.
5. *Joshua Goldman, Esquire, of the KML Law Group, P.C., counsel for U.S. Bank National Association, consents to the continuance.*

IN WITNESS WHEREOF, Debtors respectfully move that this Honorable Court continue the Hearing scheduled for July 27, 2016 at 9:30 a.m.

/s/ Richard R. Jennings

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Dated July 26, 2016

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ORDER

AND NOW, this ____ day of July, 2016, the Debtors' Motion To Continue is granted and the Confirmation Hearing/Hearing Upon Objection To Confirmation Of Plan is scheduled for the ____ day of _____, 2016 at ____m.

J.